

Exhibit 35

DIVIDING NEIGHBORS AND DIMINISHING VOICES: AN ANALYSIS OF OHIO'S CONGRESSIONAL DISTRICTS

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I. Background, Qualifications, and Purpose

I have been asked by plaintiffs in this case to review the current Ohio congressional map and to analyze the makeup and coherence of the districts in terms of their partisan, economic, and other characteristics.

Qualifications

I am a tenured faculty member at the University of Cincinnati, Department of Political Science. I received my doctorate in political science from Ohio State University. My CV is attached as Exhibit A.

I teach American politics courses including American Congress, and Government and Politics of Ohio. My research on voting patterns, political behavior, and public opinion has been published in an array of top peer-reviewed scholarly journals in political science including the *Journal of Politics*, *Political Research Quarterly*, *Polity*, *American Politics Research*, and *Social Science Quarterly*.

My research has been supported by funding from the American Political Science Association, the John F. Kennedy Library, and the Shorenstein Center on Press, Politics, and Public Policy, Harvard University.

I am being compensated at the rate of \$175 per hour. No compensation is contingent upon the nature of my findings or on the outcome of this litigation.

Materials Relied Upon

My assessment is based on a review of the underlying data that the map drawers had at their disposal during the map-drawing process, additional U.S. Census data on each district,¹ as well as a review of where the district lines are drawn. I also relied upon publicly available sources, the scholarly literature and my professional training, expertise and experience.

- The data the map drawers had at their disposal was provided in the 2010 Ohio Common and Unified Redistricting Database ("OCURD"). This database, utilized by the Republican map drawers when drawing the current district lines, was

¹ Demographic and economic data were gathered from Census reports available at <https://statisticalatlas.com/state/Ohio/Overview>. Data derived from the 2010 Census and the 2012-2016 U.S. Census Bureau American Community Survey.

produced for The Legislative Services Commission of the Ohio General Assembly by researchers at Cleveland State University. I obtained a copy of this data through counsel.

- Using the election data contained in OCURD, I present in this report data on several elections, including the 2008 presidential election and an index comprised of the results of four elections (the 2008 presidential election, the 2010 governor's election, the 2010 attorney general election, and the 2010 auditor's race). These four races were all competitive elections across which Republicans averaged 50.24% support and Democrats 49.76% support. The index (referred throughout this report as the "Index") reflects the cumulative support for the two parties across the four races, and has a potential range of .0000 (all votes in support of Democratic candidates) to 1.000 (All votes in support of Republican candidates). A result of .5000 would reflect equal support for both parties. All election data utilized in the report reflects results expressed as a percentage of the two-party vote.
- I added additional U.S. census data to allow analysis of split Census tracts and Congressional district assignments before and after the redistricting. The OCURD data combined with the additional data I relied upon are provided in the Appendix.
- Depictions of district lines were accessed on the official website of the U.S. House of Representatives, House.gov.
- I analyzed the data using the statistical program SPSS.
- I created all of the charts and figures included in this report, based on the results obtained from the dataset described.

Summary of Report

Broadly, this report proceeds as follows: After reviewing statewide data, this report proceeds to highlight examples of districts that crack (Districts 1 and 2) and pack (District 9) Democratic voters, as well as areas where both effects appear (Franklin County's Districts 3, 12, and 15; Summit County's Districts 11, 13, 14, and 16).

The data and the portraits of these district suggest a disregard for communities of common interest and a profligate lumping together of people of disparate interest. Counties, towns, and neighborhoods were split unnecessarily. This geographic jujitsu resulted in several examples of districts in Ohio that are at points are no wider than a single home.

Whether measured in the number of split Census tracts or the mismatch between Ohioans and their closest Congressional district office, the evidence presented here shows that Ohio's Congressional districts needlessly divide Ohio communities and inhibit representation. The data resoundingly support the conclusion that Democratic voters were more likely to be divided from their co-partisans in patterns consistent with the scholarly definitions of cracking and packing.